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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HAROLD DAVID SOBEL,

Defendant.

NO. 2:21-cr-00235-APG-EJY

**STIPULATION TO EXTEND TIME
FOR CORECIVIC'S RESPONSE TO
DEFENDANT'S MOTION FOR
RELEASE AND TO REPLY
REGARDING THE MOTION AND
PROPOSED ORDER
(Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United States Attorney for the District of Nevada, and Mina Chang, Assistant United States Attorney, and Gustav W. Eyler, Director, and Meredith B. Healy and Wei Xiang, Trial Attorneys, U.S. Department of Justice, Consumer Protection Branch, counsel for the United States of America; Jacqueline Tirinnanzi and Kathleen Bliss, counsel for Harold David Sobel ("Defendant"); and Jacob B. Lee, counsel for Non-Party CoreCivic, Inc. ("CoreCivic"), that the parties request this Court to extend the deadline for CoreCivic to file its Response to Defendant's Motion for Release Pending Sentencing and Supplement (Dkt. 55, 58) by one day to August 23, 2022.

1 On July 22, 2022, Defendant filed a Motion for Release Pending Sentencing¹ (Dkt. 55) and
2 on July 29, 2022, filed a Supplement to the Motion (Dkt. 58). The general basis of the Motion
3 concerned Defendant's medical care at CoreCivic's Nevada Southern Detention Center ("NSDC"),
4 where he is currently detained. The government filed its Response to Defendant's Motion on
5 August 5, 2022. (Dkt. 61.) That same day, CoreCivic filed a Notice Regarding Defendant's Motion
6 for Release Pending Sentencing and Supplement. (Dkt. 64.) On August 8, 2022, this Court ordered
7 CoreCivic to file a Response as to Defendant's medical care by August 22, 2022. (Dkt. 65.)

8 Defendant and the government thereafter stipulated and requested that the Court allow
9 Defendant to file his Reply to the government's and CoreCivic's responses within three days of the
10 filing of CoreCivic's Response and for the government to file a Reply only as to CoreCivic's
11 Response by the same date—i.e., by August 25, 2022. (Dkt. 66.) The Court granted the stipulation
12 on August 15, 2022. (Dkt. 67.)

13 Due to unforeseen logistical complications, CoreCivic has been unable to finalize the
14 Declaration of Jay Peterson, APRN, who is one of Defendant's medical providers at NSDC.
15 Extending the deadline for CoreCivic's Response by one day to August 23, 2022 will allow
16 CoreCivic to finalize APRN Peterson's Declaration and obtain his signature on it. In light of this
17 extension, the parties further stipulate and request that the Court extend the government's and
18 Defendant's deadline to file their Replies to August 26, 2022.

19 Denial of this request would deny CoreCivic the ability to provide the Court with a complete
20 picture of the care Defendant is receiving at NSDC and would deny counsel for Defendant the
21 opportunity to prepare a complete Reply to the additional information to be provided by CoreCivic
22 as it relates to this original Motion and Supplement. This stipulation and request for extension of
23 these deadlines is mindful of the exercise of due diligence, in the interests of justice, and not for
24 any purposes of delay.
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1 DATED this 22nd day of August, 2022.

2 STRUCK LOVE BOJANOWSKI & ACEDO, PLC

3
4 By /s/ Jacob B. Lee

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19 By /s/Mina Chang
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22 GUSTAV W. EYLER
23 Director, U.S. Department of Justice

24 By /s/Meredith Burns Healy
25 MEREDITH BURNS HEALY
26 *Trial Attorney*

27 By /s/Wei Xiang
28 WEI XIANG
Trial Attorney

By: /s/Jacqueline Tirinnanzi
JACQUELINE TIRINNANZI, ESQ.
Counsel for Harold David Sobel

IT IS SO ORDERED.


THE HONORABLE ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

DATED: August 24, 2022